

LEWIS BRISBOIS BISGAARD & SMITH LLP

JON P. KARDASSAKIS, SB# 90602

E-Mail: Jon.Kardassakis@lewisbrisbois.com

BRANT H. DVEIRIN, SB# 130621

E-Mail: Brant.Dveirin@lewisbrisbois.com

DANIELLE E. STIERNA, SB# 317156

E-Mail: Danielle.Stierna@lewisbrisbois.com

633 West 5th Street, Suite 4000

Los Angeles, California 90071

Telephone: 213.250.1800

Facsimile: 213.250.7900

Attorneys for HOUSING AUTHORITY
OF THE CITY OF LOS ANGELES

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

MICHAEL AZAR individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

HOUSING AUTHORITY OF THE
CITY OF LOS ANGELES and DOES 1
through 100, inclusive,

Defendants.

Case No. 2:23-cv-5001

NOTICE OF RELATED CASES

Related Cases:

Fuentes v. HACLA et al., 2:23-cv-
03295-SPG(JPRx);

Neal-Burgin v. HACLA et al., 2:23-cv-
03826-SPG(JPRx);

Harris et al. v. HACLA, 2:23-cv-
04339-SPG(JPRx)

Cannady v. HACLA, 2:23-cv-04614-
SPG(JPRx)

Complaint Removed: June 23, 2023

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Local Rule 83-1.3, Defendant Housing Authority of the City of
Los Angeles (“HACLA”) hereby provides notice to the court of the following
substantially related actions presently pending before this court:

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- 1 (1) *Corrine Fuentes v. Housing Authority of the City of Los Angeles, et al.*
2 Case No. 2:23-CV-03295-SPG(JPRx);
3 (2) *Xavier Neal-Burgin v. Housing Authority of the City of Los Angeles, et al.*,
4 Case No. 2:23-cv-03826-SPG(JPRx);
5 (3) *Darcel Harris, et al. v. Housing Authority of the City of Los Angeles*, Case
6 No. 2:23-cv-04339-SPG(JPRx); and
7 (4) *William Cannady v. Housing Authority of the City of Los Angeles*, Case
8 No. 2:23-cv-04614-SPG(JPRx).
9 (the “Other Actions,” and with the above-captioned case, the “Actions”).
10

11 Pursuant to Local Rule 83-1.3, the actions are related to one another when
12 two or more cases:

- 13 (a) arise from the same or a closely related transaction, happening, or event;
14 (b) call for determination of the same of substantially related or similar
15 questions of law and fact; or
16 (c) for other reasons would entail substantial duplication of labor if heard by a
17 different judges.
18

19 **BRIEF STATEMENT OF RELATIONSHIP**

20 When this case was removed on June 23, 2023, the Civil Cover Sheet filed
21 with the Notice of Removal identified the Other Actions as related cases.

22 All five actions are putative class actions against the same defendant and arise
23 out of the same data security incident HACLA suffered and about which it provided
24 notice. The named plaintiffs in the five actions allege to have received notice from
25 HACLA and base their claims on the same incident. Many of the claims between
26 the five actions are the same. Therefore, all five cases involve the determination of
27 the same or substantially related or similar questions of law and fact. To have the
28 related cases tried in different courtrooms before different judges would result in

1 substantial duplication of labor. A similar Notice of Related Cases will be filed in
2 the lowest numbered *Fuentes* Other Action.

3
4 DATED: June 23, 2023

LEWIS BRISBOIS BISGAARD & SMITH LLP

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6 By: /s/ Danielle E. Stierna
7 DANIELLE E. STIERNA
8 Attorneys for HOUSING AUTHORITY
9 OF THE CITY OF LOS ANGELES
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FEDERAL COURT PROOF OF SERVICE

Michael Azar v. Housing Authority of the City of LA – Case No. 2:23-cv-5001

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On June 23, 2023, I served the following document(s): **NOTICE OF RELATED CASES** on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Ryan J. Clarkson
Yana Hart
Tiara Avanes
Valter Malkhasyan
CLARKSON LAW FIRM, P.C.
22525 Pacific Coast Highway
Malibu, California 90265
Tele: (213) 788-4050 - Fax: (213) 788-4070
rclarkson@clarksonlawfirm.com
yhart@clarksonlawfirm.com
tavaness@clarksonlawfirm.com
vmalkhasyan@clarksonlawfirm.com

***Counsel for Plaintiff MICHAEL AZAR
and the Proposed Class***

The documents were served by the following means:

- ☒ (BY U.S. MAIL) I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses listed above and I deposited the sealed envelope or package with the U.S. Postal Service, with the postage fully prepaid.
- ☒ (BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent from e-mail address farnaz.moradpour@lewisbrisbois.com to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on June 23, 2023, at Los Angeles, California.

/s/ Farnaz Moradpour
Farnaz Moradpour